

BARRACK, RODOS & BACINE

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF SAN BERNARDINO
COUNTY EMPLOYEES' RETIREMENT
ASSOCIATION TO SECURITIES LEAD
PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.I. 9189]**

1 San Bernardino County Employees' Retirement Association, the holder of a Securities
2 Claim¹ and a creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of the above-
3 captioned reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan, the
4 "**Reorganized Debtors**"), by and through its undersigned counsel, submits this joinder (this
5 "**Joinder**") to *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve*
6 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket
7 No. 9189] (the "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to*
8 *Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims*
9 [Docket No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, San Bernardino
10 County Employees' Retirement Association, respectfully states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

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13 1. San Bernardino County Employees' Retirement Association is a Securities
14 Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim
15 Nos. KKQ\$S27423 and SSJAQ27423).

16 2. San Bernardino County Employees' Retirement Association incorporates by
17 reference and hereby joins in all arguments set forth in the Securities ADR Objection.

18 3. San Bernardino County Employees' Retirement Association reserves its right to
19 supplement this Joinder and further reserves its rights to participate in any hearing to consider
20 the Securities ADR Motion, including its rights to make any arguments and to examine
21 witnesses.
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26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, San Bernardino County Employees' Retirement
3 Association respectfully requests that this Court enter an Order denying the Securities ADR
4 Motion and granting such other and further relief as may be just and proper.
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6 Dated: November 6, 2020

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